

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**TALECRIS BIOTHERAPEUTICS, INC., and  
BAYER HEALTHCARE LLC,**

**Plaintiffs,**

**v.**

**BAXTER INTERNATIONAL INC., and  
BAXTER HEALTHCARE CORPORATION,**

**Defendants.**

**C.A. No. 05-349-GMS**

**Jury Trial Demanded**

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**BAXTER HEALTHCARE CORPORATION,**

**Counterclaimant,**

**v.**

**TALECRIS BIOTHERAPEUTICS, INC., and  
BAYER HEALTHCARE LLC,**

**Counterdefendants.**

**PLAINTIFFS' NOTICE OF DEPOSITION OF JOEL CLAUDE**

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that beginning on September 22, 2006 at 9:30 a.m., at the offices of Bird & Bird, Avenue d'Auderghem 22-28, Brussels 1040, Belgium, counsel for Plaintiffs Talecris Biotherapeutics, Inc. and Bayer Healthcare LLC will take, pursuant to Federal Rules of Civil Procedure 28 and 30, the deposition upon oral examination of Joel Claude.

The deposition will be taken before an officer authorized to administer oaths and will continue from hour to hour and day to day until completed. You are invited to attend and cross-examine.

Please be advised that this deposition may be recorded by videotape in addition to stenographic recording, which will include the use of LiveNote real time transcription.

Date: August 28, 2006

CONNOLLY BOVE LODGE & HUTZ LLP

/s/ Jeffrey B. Bove

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**CERTIFICATE OF SERVICE**

I, JEFFREY B. BOVE, do hereby certify that I caused a true copy of the foregoing document, **PLAINTIFFS' NOTICE OF DEPOSITION OF JOEL CLAUDE**, to be served upon the below listed in the manner indicated on August 28, 2006.

**Via Hand Delivery and E-Mail**

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**Via Federal Express and E-Mail**

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By: /s/ Jeffrey B. Bove  
Jeffrey B. Bove (# 998)